



LOWEY DANNENBERG, P.C.

April 5, 2022

VIA ECF

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Sullivan v. Barclays plc et al.*, No. 13-cv-2811 (PKC)

Dear Judge Castel:

As counsel for Plaintiffs, we are pleased to report that Plaintiffs and Defendants Cr dit Agricole S.A. and Cr dit Agricole CIB (collectively, "Cr dit Agricole") executed a Stipulation and Agreement of Settlement.

Because this action is pending on appeal, Plaintiffs and Cr dit Agricole jointly moved the Second Circuit for: (1) partial severance of the pending appeal as to Cr dit Agricole only, (2) stay of the severed appeal, and (3) limited remand so that this Court may consider approval of Plaintiffs' class action settlement with Cr dit Agricole pursuant to Rule 23 of the Federal Rules of Civil Procedure. That motion was granted on March 24, 2022. *See Sullivan v. Barclays plc et al.*, Appeal Nos. 19-1769 & 19-2012 (2d Cir.), ECF No. 148; *see also* ECF No. 513 (certified order filed on above-referenced docket).

In accordance with this Court's Individual Rules of Practice, Part 3.A.1.(i) and the Second Circuit's remand order, we submit this Pre-Motion Letter requesting permission to file a motion seeking preliminary approval of this settlement with Cr dit Agricole. Plaintiffs anticipate filing the motion on or before **April 19, 2022**. Cr dit Agricole consents to the filing of this anticipated motion. There is no conference currently scheduled before this Court.

We are available to address any questions Your Honor may have.

Respectfully,

/s/ Vincent Briganti
Vincent Briganti
Lowey Dannenberg, P.C.

/s/ Christopher Lovell
Christopher Lovell
Lovell Stewart Halebian Jacobson LLP

cc: All Counsel of Record (via ECF)

Pre-Motion
request
waived for
motion for
preliminary
approval.
File no
later than
April 29, 2022
SO ORDERED
4-5-22